

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

INDUSTRIA DE ALIMENTOS ZENÚ S.A.S.

Plaintiff/Counter Defendant,

v.

LATINFOOD U.S. CORP. d/b/a ZENÚ
PRODUCTS CO. and WILSON ZULUAGA,

Defendants/Counter Claimants/
Third Party Plaintiffs,

v.

CORDIALSA USA, INC.

Third Party Defendant.

Civil Action No. 2:16-cv-06576-KM-MAH

Motion Date: December 18, 2023

NOTICE OF CROSS-MOTION

PLEASE TAKE NOTICE that on December 18, 2023, at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff Industria de Alimentos Zenú S.A.S. (“Industria”) will move before the Honorable Magistrate Judge Michael A. Hammer in the United States District Court for the District of New Jersey, located at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, for an order pursuant to 28 U.S.C. § 1927 awarding Industria costs, expenses, and attorneys’ fees.

PLEASE TAKE FURTHER NOTICE that in support of the instant Cross-Motion, Industria shall rely upon its Letter to Magistrate Judge Michael A. Hammer dated December 4, 2023 in Opposition to Defendants’ Motion to Reconsider and in Support of Industria’s Cross-Motion, submitted herewith.

PLEASE TAKE FURTHER NOTICE that Defendants' Opposition to the Cross-Motion, if any, is due December 11, 2023.

Dated: New York, New York
December 4, 2023

Respectfully submitted,

WACHTEL MISSRY LLP

By:/s/ Peter D. Raymond
Peter D. Raymond
praymond@wmlp.com
Stella Lee Sainty
ssainty@wmlp.com
One Dag Hammarskjöld Plaza
885 Second Avenue, 47th Floor
New York, New York 10017
(212) 909-9500

-and-

REED SMITH LLP

Samuel A. Kadosh
skadosh@reedsmith.com
Brian P. Giunta
bgiunta@reedsmith.com
REED SMITH LLP
599 Lexington Avenue
New York, New York 10022
(212) 521-5400

Attorneys for Plaintiff
Industria de Alimentos Zenu S.A.S

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

INDUSTRIA DE ALIMENTOS ZENÚ S.A.S.

Plaintiff,

v.

LATINFOOD U.S. CORP. d/b/a ZENÚ
PRODUCTS CO. and WILSON ZULUAGA,

Defendants.

No. 2:16-cv-06576-KM-MAH

CIVIL ACTION

CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2023, a true and correct copy of Plaintiff Industria de Alimentos Zenú S.A.S.'s Notice of Motion against Defendants Latinfood U.S. Corp. d/b/a Zenú Products Co. and Wilson Zuluaga and accompanying Letter to Magistrate Judge Michael A. Hammer dated December 4, 2023, were filed with the Court's CM/ECF filing system and thereby served on all counsel of record for this matter.

Dated: New York, New York
December 4, 2023

By: /s/ Sam Kadosh
Sam Kadosh